



State of New Jersey

Christine Todd Whitman
Governor

Department of Environmental Protection

Robert C. Shinn, Jr.
Commissioner

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
NO. Z456933288

APR 13 2008

Mr. Cristopher Anderson
Director, Environmental Affairs
L.E. Carpenter & Company
200 Public Square
Suite 36-5000
Cleveland, OH 44114-2304

Dear Mr. Anderson:

Re: L.E. Carpenter Superfund Site
Wharton, Morris County

The New Jersey Department of Environmental Protection (Department) and EPA have reviewed the MW-19/Hot Spot 1 Area Remedial Investigation Report dated March 2000 and have the following comments:

1. The newly installed monitor wells (MW19-6, MW19-7 and MW19-8) were not installed at the locations proposed in the approved work plan entitled "Further Off-Site Groundwater Investigation at MW-19/Hot Spot 1." Since MW19-8 was installed south of the intended location it may not be positioned at the most down-gradient point to intercept the contaminant plume. In addition, MW19-6 and MW19-7 showed exceedances of the Ground Water Quality Criteria; therefore a clean zone was not established. Delineation between HP-1 and MW19-8 is required.
2. EPA is concerned that the leading edge of the plume is traveling beneath the depth of the screens of the existing wells. Therefore, it is requested that one well cluster be installed between HP-1 and MW19-8. EPA recommends the use of 10 foot well screens, with the shallow well screen extending from the water table down 10 feet, and the second extending from the bottom of the previous screen down an additional 10 feet.
3. On page 9, the document reports that benzene was not detected above method detection limits except for duplicate sample MW19-9, which was collected from MW19-7. The detection limit for benzene in water samples from MW19-6 and MW19-7 were substantially elevated (above the Ground Water Quality Standard) due to high dilution of samples. Based on the elevated levels of toluene, ethylbenzene



and xylene, and high sample dilution, it is likely that benzene was present above the Ground Water Quality Standard of 1 ppb.

Please submit a proposal for delineation of the ground water between HP-1 and MW19-8 within 30 calendar days from the receipt of this letter. If you have any questions, please contact me at (609) 633-7261.

Sincerely,



Gwen B. Zervas, P.E.
Case Manager
Bureau of Case Management

C: Stephen Cipot, EPA
Nicholas Clevett, RMT
George Blyskun, BGWPA
John Prendergast, BEERA